

## (Caption of Case)

Southern Current LLC: Cypress Creek Renewables,  
 LLC; and Birdseye Renewable Energy, LLC,  
 Complainants/Petitioners

v.

Duke Energy Carolinas, LLC and Duke Energy  
 Progress, LLC. Defendants/Respondents

BEFORE THE  
 PUBLIC SERVICE COMMISSION  
 OF SOUTH CAROLINA

## COVER SHEET

DOCKET  
 NUMBER: 2017 - 332 - E

(Please type or print)

Submitted by: Robert GuildSC Bar Number: 2358Address: 314 Pall MallTelephone: 803-252-1419Columbia, SC 29201Fax: N/AOther: 803-917-5738Email: bguild@mindspring.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☒ Other: Routine

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

Print Form

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STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2017-332-E

In the Matter of:	)	
	)	
	)	PETITION TO INTERVENE
Southern Current LLC; Cypress Creek	)	
Renewables, LLC; and Birdseye Renewable	)	
Energy, LLC, Complainants/Petitioners	)	
	)	
v.	)	
	)	
Duke Energy Carolinas, LLC and Duke	)	
Energy Progress, LLC,	)	
Defendants/Respondents		

In accordance with Rule 103-825 of the South Carolina Public Service Commission's ("Commission") Rules and Regulations, the Interstate Renewable Energy Council, Inc. ("IREC") respectfully petitions to intervene in the above-captioned proceeding.

**I. IREC'S INTEREST IN THIS PROCEEDING**

IREC is a 501(c)(3) non-partisan, non-profit organization working nationally to expand and simplify customer access to reliable and affordable distributed clean energy by: (1) developing and advancing regulatory policy innovations; (2) generating and promoting national model rules, standards, and best practices; and (3) providing workforce training, education, and credentialing. IREC works independently from renewable energy industries, trade associations, technologies, and advocacy organizations to promote the creation of robust, competitive clean energy markets.

This complaint was filed by Petitioners to challenge new “Study Guidelines” unilaterally implemented by Respondents, outside the process for updating interconnection standards, which would impact proposed distributed generation projects already in the interconnection queue. Petitioners allege the new guidelines, or “screens,” lack a technical basis, and in any case should not be applied retroactively or implemented without an opportunity for stakeholder input.

IREC was heavily involved in the recent update of South Carolina’s interconnection procedures (Docket No. 2015-362-E), helping to develop the procedures that Respondents now seeks to modify with its new guidelines. Further, IREC is involved in development and revisions of interconnection procedures across the United States, to facilitate nationwide deployment of distributed energy resources. IREC’s work includes incorporating distributed energy resource growth into utility distribution system planning and operations. As such, IREC has a substantial interest in Respondents’ decisions regarding how they implement South Carolina’s interconnection procedures, and the technical bases for doing so. Further, IREC brings its unique, nationally informed expertise to the matter, which will assist the Commission in addressing Duke’s proposal and its technical underpinnings.

## **II. THE GROUNDS FOR AND POSITION OF IREC’S INTERVENTION**

IREC’s interest in achieving South Carolina’s distributed energy resource goals and nationwide expertise makes it a valuable participant in this proceeding. Over the past five years, IREC has worked in nearly 40 states to implement successful regulatory policies and programs that have greatly reduced barriers for interconnection of distributed energy resources. In particular, as explained above, IREC was an active participant in developing South Carolina’s current interconnection procedures and is thus highly familiar with them,

and what they were designed to do. IREC is especially interested in supporting a fair and efficient interconnection process in South Carolina that effectively implements the state's recently adopted renewable energy policy, Act 236. IREC will leverage this knowledge of South Carolina's policies in particular and state and federal policies in general to provide useful, nationally based insight into the Commission's consideration of how to resolve this matter.

### **III. SERVICE**

Service of notices, orders, and other correspondence in this proceeding should be directed to the addresses set forth below:

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### **IV. RELIEF REQUESTED**

For the reasons stated above, IREC hereby petitions the Commission for permission to intervene in and be made a party of record in the above-referenced proceeding.

DATED: December 22, 2017

LAW OFFICES OF ROBERT GUILD

By: /s/ Robert Guild  
ROBERT GUILD

DATED: December 22, 2017

SHUTE, MIHALY & WEINBERGER LLP

By: /s/ Sky C. Stanfield  
SKY C. STANFIELD  
LAURA D. BEATON  
*Applications for Pro Hac Vice  
have been submitted*

Attorneys for INTERSTATE RENEWABLE  
ENERGY COUNCIL, INC.

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION

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v.

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Energy Progress, LLC,  
Defendants/Respondents

CERTIFICATE OF SERVICE

The undersigned, Amy Zehring, does hereby certify that the following persons have been served with in the above captioned proceeding by electronic mail and/or U.S. First Class

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Executed in San Francisco, CA on December 22, 2017.

/s/ Amy Zehring  
Amy Zehring

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